

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GREGORY HEARN, SR. and DANA	:	CIVIL ACTION
HEARN, husband and wife in	:	
their own right, and as parents	:	NO. 02-CV-3525
and natural guardians of KYHNA	:	
HEARN and GREGORY HEARN, JR.,	:	
their children,	:	
	:	
Plaintiffs,	:	HONORABLE JAY C. WALDMAN
	:	
vs.	:	
	:	
PHILADELPHIA POLICE OFFICER BRIAN	:	
FUSS and PHILADELPHIA POLICE	:	
OFFICER JOHN FLYNN,	:	
	:	
Defendants.	:	

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Plaintiffs propose that the following voir dire questions be asked of jurors at the time of trial:

1. The parties in this action are as follows:

Plaintiffs: Gregory Hearn, Sr., Dana Hearn, Gregory Hearn, Jr., and Kyhna Hearn.

Defendants: Philadelphia Police Officers Brian Fuss and John Flynn

Do you know any party, or any family member or friends of any party?

2. The parties in this case are represented by the following attorneys:

Plaintiffs: Gerald J. Williams

Gerald J. Grant, Jr.

Defendants: Edward Chew

Do you know any associates or employees of these attorneys?

Do you know any members of the families or friends of those attorneys?

3. Have you or any member of your immediate family ever been employed by the City of Philadelphia Police Department?

4. Do you know anyone employed by or with the City of Philadelphia Police Department?

5. Have you ever served as a juror before in a criminal or civil trial? What were the facts? What was the outcome?

6. In this case, plaintiff, Gregory Hearn, Sr. alleges that he was injured by the defendant police officers' use of excessive force.

Do you have any opinion about this subject matter which would preclude you from making a fair, honest and impartial decision based upon all of the evidence?

7. There will be evidence to show that Mr. Hearn sustained substantial physical injuries because of defendants' conduct. Do you have any social, religious, moral or philosophical belief which would preclude you from awarding to plaintiff a substantial amount of money for physical injuries if that award was warranted by the evidence?

8. Would you be inclined to give greater weight to the testimony of police officer than to the testimony of an ordinary citizen?

9. Have you ever read or heard about suits against police charging that police used excessive force? What impression/opinion do you have about such law suits?

10. Have you ever been involved in a lawsuit either as a plaintiff or defendant?

11. Do you have any medical condition which would not allow you to properly carry out your duties as a juror?

12. It is anticipated that this civil trial will take approximately three days. Would there be any great undue hardship on you to serve as a juror in this case?

13. Is there any other reason you could not serve as a juror in this case?

WILLIAMS CUKER & BEREZOFSKY

By: _____

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